

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

LVL PATENT GROUP, LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP; AT&T MOBILITY,  
LLC; SPRINT SPECTRUM L.P.; T-MOBILE  
USA, INC.; CRICKET COMMUNICATIONS,  
INC.; LEAP WIRELESS INTERNATIONAL,  
INC.; VIRGIN MOBILE USA, L.P.; UNITED  
STATES CELLULAR CORPORATION;  
METROPACS WIRELESS, INC.; TRACFONE  
WIRELESS, INC.; BOOST MOBILE, LLC;  
APPLE, INC.; RESEARCH IN MOTION  
CORPORATION; NOKIA INC.; SAMSUNG  
TELECOMMUNICATIONS AMERICA,  
INC.; MOTOROLA MOBILITY, INC.; HTC  
AMERICA, INC.; SHARP ELECTRONICS  
CORPORATION; PANTECH WIRELESS,  
INC.; LG ELECTRONICS MOBILECOMM  
U.S.A., INC.; HEWLETT-PACKARD  
COMPANY; SONY ERICSSON MOBILE  
COMMUNICATIONS (USA), INC.; CASIO  
AMERICA, INC.; FUTUREWEI  
TECHNOLOGIES, INC. DBA HUAWEI; ZTE  
(USA) INC.; KYOCERA WIRELESS CORP.;  
AND SANYO NORTH AMERICA  
CORPORATION,

Defendants.

C.A. No. 11-827-SLR

**SECOND UNOPPOSED MOTION TO EXTEND TIME FOR SAMSUNG  
TELECOMMUNICATIONS AMERICA, LLC. TO RESPOND TO COMPLAINT**

Defendant Samsung Telecommunications America, LLC ("STA")<sup>1</sup> respectfully moves this Court to extend the deadline for defendant STA to answer, move or otherwise respond to the

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<sup>1</sup> LVL's Complaint names Samsung Telecommunications America, Inc. as defendant. Samsung Telecommunications America, Inc., however, is not an existing entity. It appears that LVL intended to name STA. Therefore, while it appears that LVL improperly named Samsung

Complaint filed in this matter until November 30, 2011. On October 18, 2011, this Court granted Plaintiff LVL Patent Group, LLC's ("LVL") first motion to extend time for STA to answer, move or otherwise respond to the Complaint to November 23, 2011.

The grounds for this motion are that STA has requested, and Plaintiff LVL has agreed to, an additional seven day extension to November 30, 2011 to answer, move, or otherwise respond to the Complaint, as set forth above, while Defendant investigates Plaintiff's claims. LVL consents to the filing of this motion.

Dated: November 8, 2011

YOUNG CONAWAY STARGATT  
& TAYLOR, LLP

/s/ Adam W. Poff

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ATTORNEYS FOR DEFENDANT  
SAMSUNG TELECOMMUNICATIONS  
AMERICA, LLC

IT IS SO ORDERED this \_\_\_\_\_ day of November, 2011.

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The Honorable Sue L. Robinson  
United States District Judge

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Telecommunications America, Inc. as a defendant, in an abundance of caution, STA files this extension for all/any Samsung named defendants.

**CERTIFICATE OF SERVICE**

I, Adam W. Poff, Esquire, hereby certify that on November 8, 2011, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

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I further certify that on November 8, 2011, I caused a true and correct copy of the foregoing document to be served by e-mail on the above-listed counsel of record.

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